



South Coast
Air Quality Management District

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Mr. Gary Jones
Director of Community Development
City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755-3799

**Draft Environmental Impact Report (DEIR) for the Proposed
EDCO Recycling and Transfer Facility Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely

Steve Smith, P.h.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC081112-07
Control Number

Air Quality Analysis - Construction

1. When discussing air quality significance thresholds to be used to determine whether or not air quality impacts are significant, the lead agency identifies a number of potential significance thresholds, including the LSTs recommended by the SCAQMD for use by other public agencies. It is recommended that the lead agency also use the SCAQMD recommended regional significance thresholds (see <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>) when determining air quality significance.
2. Table 3.5-5 on page 3.5-9 appears to show peak daily construction air quality impacts. Review of the URBEMIS2007 output sheets in Appendix D shows different peak daily construction emissions than are shown in Table 3.5-5. In the Final EIR, please explain or correct this apparent inconsistency.

Air Quality Analysis - Operation

3. In Section 3.5.4 the lead agency concludes that the proposed project's air quality impacts do not exceed any significance thresholds and, therefore, no mitigation is required. However, review of Table 3.5-8 shows that total daily NO_x emissions (both on-site and off-site) substantially exceed the NO_x regional significance threshold of 55 pounds per day. Table 3.5-8 should be revised accordingly.

On page 3.5-12, the lead agency states that operational air quality impacts are not significant because the mobile source emissions would continue to occur as a result of transport of wastes to local landfills. SCAQMD staff strongly disagrees with the displaced truck trip methodology used by the lead agency that incorrectly suggests that the proposed project will reduce emissions. The proposed project will not eliminate truck trips that would otherwise haul biosolids and biomass to other locations because of increasing population growth and the associated future increases in the amount of waste materials generated locally. Further, there is no analysis that the other truck trips would be eliminated to support such an assumption. The only way the lead agency can take credit for the displaced truck trips is to prohibit them through some legally binding agreement. The SCAQMD has always advocated that a project analyzed in a CEQA document take responsibility for all of the emissions generated by the proposed project. It is likely that eliminating the inappropriate credit for displaced truck trip emissions would result in significant operational NO_x emissions. As a result, mitigation measures would be required.

Health Risk Assessment

The health risk assessment documentation does not provide sufficient information to evaluate the health risk assessment (HRA) analysis and results. The documentation should allow the public to recreate the health risk assessment and include references. Specific issues and concerns relative to the HRA are identified in the following comments

4. Table 1 Basis of Emission Calculation EDCO Recycling and Transfer Station Project in Appendix D presents DPM emission rates and stack parameters. However, no documentation on the sources of the information or the calculations is provided.

The total current DPM emission rate is presented as 0.12 ton per year, 0.028 pound per hour and 7.75E-6 grams per second. The 0.028 pound per hour can be estimated from 0.12 ton per year using 365 days per year and 24 hours per day. However, it is not clear how 7.75E-6 grams per second were derived from 0.028 pound per hour. From simple conversion of units, 0.028 lb/hr should be 0.035 gram per second (0.028 lb/hr x 453.59 grams per pound x hour per 3,600 seconds).

The equations used to estimate emission should be presented in the Final EIR. The gram per second emission rate should be verified and corrected if needed in the Final EIR.

5. Appendix D states, "For the current analysis, we assumed that actual diesel particulate emission emissions would remain the same for the next 70 years. In reality, these emissions would be 80 percent to 90 percent lower than current emissions due to current state regulations that require 75 percent reduction in diesel exhaust emissions over the next 10 years." An 80 percent reduction was used to estimate future reductions. It is not clear which regulations are referenced by these statements. The specific regulations should be documented and time lines should be presented. Emission factors should be developed from a weighted average of fleet year EMFAC2007 emission factors with emission reductions occurring during the correct fleet years. It is likely that an 80 percent reduction for future years may not provide a sufficiently conservative analysis. The Final EIR should demonstrate that the emission rates are conservative (i.e., at least as conservative as using fleet year weighted average EMFAC2007 emission factors).
6. The emissions presented in Table 1 Basis of Emission Calculation EDCO Recycling and Transfer Station Project in Appendix D do not match the emissions presented in Table 1-7 Summary of Daily and Annual Operational Emissions in the main text of Appendix D. Table 1 presents the DPM emission rate to be 0.12 tons per year. Table 1-7 presents idling emission rates to be 0.010 ton per year and on-site equipment 0.852 ton per year. The emissions rates in the Final EIR should be consistent. If these emissions rates are correct, an explanation should be included to explain why these emissions are not consistent.

It is not clear if the HRA includes all diesel emissions from the proposed project or only the diesel idling from trucks.

7. The calms routine was used in the air dispersion modeling. SCAQMD policy regarding use of meteorological data requires that the calms routine not be used. Since SCAQMD Long Beach meteorological data were used, the calms routine should be turned off in the Final EIR.
8. Figure 3.5-1 in the Draft EIR presents a carcinogenic health risk of 0.48291 in one million. The output file in Appendix D presents a DPM concentration of 0.48291 microgram per cubic meter. No health risk calculation is presented. It appears that the maximum

concentration is of 0.48291 microgram per cubic meter and that it is misreported as the cancer risk in Figure 3.5-1.

DPM concentration in microgram per cubic meter is converted to carcinogenic health risk using the following equation.

$$\text{Cancer risk} = \text{Cancer Potency (CP)} \cdot \text{Inhalation Dose (Dose-Inh)}$$

$$\text{Dose-Inh} = 10^{-6} \cdot C_{\text{air}} \cdot \text{DBR} \cdot (\text{EF} \cdot \text{ED})/\text{AT}$$

Where,

- CP = Cancer potency; the cancer potency for DPM is 1.1 cancers/mg/kg-day;
- Dose-inh = Dose through inhalation (mg/kg-day);
- 10^{-6} = Unit conversion factor;
- C_{air} = Model-estimated DPM concentration ($\mu\text{g}/\text{m}^3$);
- DBR = Daily breathing rate (L/kg-day);
- EF = Exposure frequency (days/year);
- ED = Exposure duration (years); and
- AT = Averaging time period over which exposure is averaged, in days.

Assumptions for the above parameters are given in the table below:

Receptor	DBR	EF	ED	AT
Residential	302*	350	70	25,550
Worker	149	245	40	25,550

* 80th percentile breathing rate per ARB's interim risk management guidance for inhalation risk at residential receptors.^[12]

The maximum individual cancer risk (MICR) and maximum exposed individual worker (MEIW) should be identified on Figure 3.5-1. The actual calculation used should be presented along with all parameters used (e.g., modeled concentration, daily breathing rate, cancer potency factor, etc.).

Page 3.5-14 states that the nearest homes are located 500 feet to the south of the proposed project, then states health risk for the nearest residents. On page 3.5-8, the lead agency states that the nearest receptors are 275 feet west of the proposed project. According to the wind rose for the Long Beach meteorological data (also evident from isopleths Figure 3.5-1.), the prevailing wind direction blows from the southwest to the northwest. Therefore, it is not clear from the Draft EIR where the nearest sensitive receptor is located and whether the nearest residential receptors are included within the MICR isopleth or are only the closest residential/sensitive receptors. The Draft EIR should clearly present the residential/sensitive receptor with the highest health risk.

SCAQMD Permitting and Compliance

9. In the conceptual drawings in Figures 2-4 through 2-8 on pages 2-7 through 2-9, the location, number, configuration, and height of the exhaust stacks from the described ventilation and filtration system are not detailed in the drawings and should be included in the Final EIR.
10. On page 3.5-7, the lead agency should cite in the Final EIR how the lead agency will comply with the following SCAQMD rules and regulation:
 - Rules 201 – Permit to Construct;
 - Rule 203 – Permit to Operate;
 - Regulation XIII – New Source Review; and
 - Rule 1401 – New Source Review of Toxic Air Contaminants.
11. The Draft EIR does not mention the potential use of a backup engine generator for the electricity generation in case of an outage; which is typically part of a facility's installed equipment. If such a generator is planned and will be greater than 50 brake HP, that information should be included in the Final EIR and that equipment shall be installed and operated in accordance with applicable SCAQMD rules.